

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Alexandria Division

Svetlana Lokhova,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:20-cv-1603 (LMB)(WEF)
)	
Stefan A. Halper,)	
)	
Defendant/)	
Counterclaimant)	

**Defendant/Counterclaimant Halper’s Motion to Dismiss, for Default Judgment, and to
Strike Plaintiff’s Motion and Declaration**

Defendant/Counterclaimant Stefan Halper (“Defendant”) moves this Court pursuant to Rules 37 and 41 of the Federal Rules of Civil Procedure for an order dismissing Plaintiff Svetlana Lokhova’s Amended Complaint (Docket Entry (“D.E.”) 52), granting a default judgment on Defendant’s counterclaims (D.E. 65), and striking the pending motion of Plaintiff for dismissal or summary judgment on the counterclaims and the unsworn declaration of Plaintiff offered in support of Plaintiff’s motion. D.E. 70 & 70-1.

Respectfully submitted,

By: ____/s/_____

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